

REESE LLP

Via CM/ECF

February 22, 2023

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas St., Chambers 533
White Plains, New York 10601

Re: *Anderson v. Unilever United States, Inc.*, No. 21-cv-3117 (KMK) (AEK)

Dear Judge Karas,

We represent Plaintiff Aliyah Anderson (“Plaintiff”) and the proposed New York class in the above-referenced action. We write in conjunction with Defendant Unilever United States, Inc. (“Defendant”) to jointly request the Court stay the present schedule for 90-days to give the parties additional room to attempt to resolve the matter.

Pursuant to the current Scheduling Order (ECF No. 42), the parties have until April 23, 2023, to complete fact discovery, May 27, 2023, to complete Plaintiff’s expert discovery and move for class certification, as well as additional deadlines following thereon. Under the watchful eye of Magistrate Krause, the parties have conducted extensive written discovery and are swiftly moving towards engaging experts, scheduling depositions, and resolving remaining discovery disputes.

From the early days of discovery, the parties have engaged in settlement negotiations; allowing both the litigation and potential settlement to run in tandem. Those negotiations have proven productive, but at this juncture, the parties feel mediation presents the best avenue to carry the negotiations across the line. The parties would like the opportunity to focus on reaching a resolution of this case before incurring the additional expenses and disruptions associated with depositions, experts, and significant motion practice. Accordingly, the parties believe that mediation accompanied by a stay of discovery and other case deadlines would be constructive.

The parties therefore respectfully request the Court stay the current schedule for 90 days. A stay will provide the parties time to schedule and conduct the mediation while preserving party resources on depositions and experts as well as judicial resources on potential discovery disputes and remaining motion practice. To ensure time is not wasted, the parties suggest providing a letter to the Court within 21 days updating the Court on the status of scheduling the mediation. The parties further propose that they report to the Court within seven days following the mediation whether it was successful, whether an additional session is scheduled, or, if unsuccessful, propose a revised schedule for completion of discovery and class certification. The parties further propose that the Case Management Conference currently scheduled for May 4, 2023, be continued approximately 30 days, which would align with the proposed 90-day stay.

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Neither party has sought nor received an extension of the current case schedule in the present action.

Respectfully submitted,

/s/ Charles D. Moore

Charles D. Moore

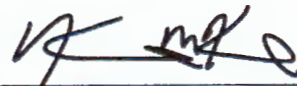
cc: All counsel of record, via CM/ECF

~~PROPOSED~~ ORDER

Having reviewed Plaintiff's Consented Letter Motion to Stay Proceeding, IT IS ORDERED that the proceeding is stayed for 90-days. It is further ordered that the parties will provide a letter to the Court within 21 days, updating the Court on the status of scheduling the mediation; and the parties will report to the Court within seven days following the mediation whether it was successful, whether an additional session is scheduled, or, if unsuccessful, propose a revised schedule for completion of discovery and class certification. The May 4 case management conference is adjourned to 6/22/23, at 2:00

Dated: February 23, 2023

White Plains, New York



THE HON. KENNETH M. KARAS
UNITED STATES DISTRICT JUDGE